

# **BAILEY JOHNSON**

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May 17, 2024

**Via CM/ECF**

Honorable Glenn T. Suddaby  
United States District Court for the  
Northern District of New York  
Federal Building and US Courthouse  
15 Henry St.  
Binghamton, NY 13901

**Re: Livingston, et al. v. Trustco Bank**  
**Civil Case No.: 20-cv-1030 (GTS/ML)**  
**Our File No.: 2502-TB20**

Dear Judge Suddaby:

We represent Defendant Trustco Bank in the above-referenced matter. We are writing to request an extension of the deadlines set forth in the Court's February 23, 2024 Order Granting Preliminary Approval of the Class Action Settlement. Within the Court's Order, Defendant is directed to transfer the class list to the Settlement Administrator no later than May 21, 2024. It has become necessary to request an extension of time for Defendant to transfer the class list.

In order to prepare the Class List, a significant amount of data must be pulled from Trustco Bank's archived files and provided to its expert in order to prepare an initial list of accounts that meet the requirements of the Class. Given the volume of data required for the Class analysis, the process has taken longer than initially expected.

In light of these circumstances, we are respectfully requesting an additional 60 days to provide the class list to the Settlement Administrator and for the remaining deadlines, as outlined below, to be extended accordingly. Class Counsel does not oppose this request.

For the Court's convenience, below please find Defendant's proposed amended dates.

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Defendant Transfers Class List to Settlement Administrator	July 19, 2024
Settlement Administrator Sends Notice and Website Goes Live	August 19, 2024
Last Day for Individuals to Opt Out of Settlement Class	September 18, 2024
Motion for Final Approval and Attorneys' Fees Filed with Court	September 23, 2024
Last Day to Object to Settlement Agreement	October 8, 2024
Last Day to File Responses to Objections	October 15, 2024
Final Approval Hearing	October 18, 2024, or as soon thereafter as the Court is available
Filing by Settlement Administrator of Final Report	Thirty (30) days After Time to Cash Checks has Expired

Thank you for the Court's courtesies and consideration in this matter.

Respectfully,



Crystal R. Peck

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